

EXHIBIT C

JJHCS INDEX IN SUPPORT OF MOTION TO SEAL
PORTIONS OF SAVEONSP'S MOTION TO COMPEL DOCUMENTS REGARDING JJHCS'S MITIGATION EFFORTS
(ECF NOS. 372, 376, 382 & 385)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to produce documents regarding JJHCS's mitigation efforts, dated August 30, 2024 (ECF No. 372)</u>		JJHCS requests the redaction of information in and exhibits to the August 30 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. Additionally, exhibits 3 and 4 contain documents	<p>If filed on the public docket, these portions of the August 30 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–5 & 7	Various redactions discussing confidential exhibits					

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Exhibit 1	Sealing of portions of JJHCS's responses and objections to SaveOnSP's interrogatories reflecting confidential business information	that were produced by non-party TrialCard and designated as Attorneys' Eyes Only. These exhibits also contain information confidential to JJHCS.	confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibits 2, 3, 4, 5, 7, 8, 9, 10, 14, 15, 17, 18, 19, 20, 24 & 25	Sealing of documents produced during discovery that reflect confidential business information					

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Exhibits 6, 13, 13.1, 16, & 26	Sealing of emails and attachments reflecting confidential business information					
Exhibit 11	Redactions to discovery letter discussing confidential documents					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated September 9, 2024 (ECF No. 376)</u>		JJHCS requests the redaction of information in and exhibits to the September 9 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits	If filed on the public docket, these portions of the September 9 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is	None	None
Page 2, note 2 Pages 6–9	Various redactions discussing confidential exhibits					

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Exhibits 6, 11 & 12	Redactions to discovery letters discuss confidential documents	contain sensitive business information.	Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	available or practicable.		

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<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to JJHCS's opposition to SaveOnSP's motion to compel, dated September 16, 2024 (ECF No. 382)</u>		JJHCS requests the redaction of information in and exhibits to the September 16 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the September 16 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 2, note 1 Pages 3– 6, 8	Various redactions discussing confidential exhibits					

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Exhibit 27	Redactions to JJHCS's responses and objections to SaveOnSP's request for production of documents reflecting confidential business information		confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			
Exhibits 28, 29, 30, 32, 33, 34, 35 & 36	Sealing of emails and attachments reflecting confidential business information					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson requesting leave to file surreply to SaveOnSP's motion to compel, dated September 18, 2024 (ECF No. 385)</u>		JJHCS requests the redaction of information in and exhibits to the September 18 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain	If filed on the public docket, these portions of the September 18 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–3	Various redactions discussing confidential exhibits					

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Exhibits 13 & 14	Sealing of confidential agreements with TrialCard produced during discovery that reflect confidential business information	sensitive business information.	Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			